

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**Cause No. 1:19-cr-03113-JB**

**ROBERT PADILLA, et al.,**

**Defendants.**

**UNOPPOSED MOTION TO EXTEND MOTION *IN LIMINE* DEADLINE**

Defendant Tomas Sanchez, through counsel, The Law Office of Ryan J. Villa, by Ryan J. Villa, moves the Court to extend the deadline to file motions *in limine* currently set for May 28, 2021 and corresponding deadlines for responses and replies for twenty-one (21) days and as grounds for this Motion states:

1. On September 11, 2019, a grand jury returned a 19-count Indictment charging all 12 Defendants with conspiracy to commit distribution of controlled substances. *See* Indictment, Count 1 [Doc. 2]. Each Defendant is also charged in one or more of the other 18 counts. *Id.* at Counts 2-19.
2. Mr. Sanchez is individually charged in Count 1: conspiracy in violation of 21 U.S.C. § 846; Count 6: possession with intent to distribute fentanyl in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C); and Count 7: possession with intent to distribute cocaine in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C). *Id.* [Doc. 2].
3. Trial in this matter is currently set for October 18, 2021. *See* Order [Doc. 288].
4. Defendants' deadline to file motions *in limine* was May 28, 2021. *Id.*

5. If Mr. Sanchez's request for an extension is granted, the motions *in limine* deadline would be June 18, 2021, the response deadline would be July 2, 2021, and the reply deadline would be July 16, 2021.

6. Mr. Sanchez believes a non-cooperation plea agreement can be negotiated in this matter without the need for trial or the filing of any motions *in limine*. Accordingly, Mr. Sanchez requests additional time to engage in said negotiations and exhaust potential plea avenues prior to litigating the motions *in limine* as he anticipates will be necessary if his case goes to trial.

7. Counsel has contacted Assistant United States Attorney, Elaine Ramirez, who indicates that the United States does not oppose Mr. Sanchez's request as indicated herein.

8. Counsel has also contacted all co-defendants in this case. Co-defendants Robert Padilla, through Mr. Joe Romero, Marcos Ruiz, through Michael Alarid Jr., Ashley Romero, through Gregory Acton, and Janaya Atencio through Ms. Megan Mitsunaga do not oppose Mr. Sanchez's request as indicated herein.

WHEREFORE, undersigned counsel for Defendant Tomas Sanchez respectfully requests this Court enter an order extending the motion *in limine* deadlines for twenty-one (21) days.

Respectfully Submitted,  
The Law Office of Ryan J. Villa

/s/ Ryan J. Villa  
RYAN J. VILLA  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing pleading was sent via the Court's CM/ECF system to opposing counsel on this 28th day of May 2021.

/s/ Ryan J. Villa

Ryan J. Villa